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**From:** Taylor, Christopher [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6CAB0BC44F5443538356D481952587DE-TAYLOR, CHRISTOPHER]  
**Sent:** 8/19/2020 7:54:58 PM  
**To:** Cybulski, Walter [Cybulski.Walter@epa.gov]; Cormier, Susan [Cormier.Susan@epa.gov]; Clark, Christopher [Clark.Christopher@epa.gov]; Burden, Susan [Burden.Susan@epa.gov]  
**Subject:** RE: Question Regarding the use of Composting Materials (Wetcake) That Contain Pesticides.  
**Attachments:** NE Ethanol Issue August 2020 Background.docx

Everyone –

Hi. I wanted to pass along some background on the pesticide-containing Wetcake from the ethanol plant in our region. It contains a list of the pesticides involved and some information on biochar – apparently it doesn't appear to be a feasible solution. Do you all have any other ideas or leads that I might be able to pursue? If not that's OK; they don't want to landfill because of the cost, but if there aren't any other viable options.....

Thank you!

Chris

Christopher L. Taylor, Ph.D.  
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11201 Renner Blvd.  
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**From:** Cybulski, Walter <Cybulski.Walter@epa.gov>  
**Sent:** Monday, August 3, 2020 8:45 AM  
**To:** Taylor, Christopher <Taylor.Christopher@epa.gov>; Cormier, Susan <Cormier.Susan@epa.gov>; Clark, Christopher <Clark.Christopher@epa.gov>  
**Cc:** Burden, Susan <Burden.Susan@epa.gov>  
**Subject:** RE: Question Regarding the use of Composting Materials (Wetcake) That Contain Pesticides.

Hello, Chris.

Similar to Susan's reply, I am not aware of any follow up from Nebraska after noting in September 2019 that Susan C. might potentially be able to assist them. I do not recall anything from memory nor did I see anything in doing an email search. Thus, it does appear they contacted ORD further after replying to that initial inquiry.

Hope that is helpful.

- Walter

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**From:** Taylor, Christopher <Taylor.Christopher@epa.gov>  
**Sent:** Friday, July 31, 2020 2:44 PM  
**To:** Cormier, Susan <Cormier.Susan@epa.gov>; Cybulski, Walter <Cybulski.Walter@epa.gov>; Clark, Christopher <Clark.Christopher@epa.gov>  
**Cc:** Burden, Susan <Burden.Susan@epa.gov>  
**Subject:** RE: Question Regarding the use of Composting Materials (Wetcake) That Contain Pesticides.

Thank you Susan – I'm working to pull together several different threads and will let you know as soon as I have a basic course of action set.

Have a wonderful weekend!

Chris

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**From:** Cormier, Susan <[Cormier.Susan@epa.gov](mailto:Cormier.Susan@epa.gov)>  
**Sent:** Friday, July 31, 2020 1:38 PM  
**To:** Taylor, Christopher <[Taylor.Christopher@epa.gov](mailto:Taylor.Christopher@epa.gov)>; Cybulski, Walter <[Cybulski.Walter@epa.gov](mailto:Cybulski.Walter@epa.gov)>; Clark, Christopher <[Clark.Christopher@epa.gov](mailto:Clark.Christopher@epa.gov)>  
**Cc:** Burden, Susan <[Burden.Susan@epa.gov](mailto:Burden.Susan@epa.gov)>  
**Subject:** RE: Question Regarding the use of Composting Materials (Wetcake) That Contain Pesticides.

Dear Chris,

I didn't find anything from LeMaistre or NDEE.

I do not have a laboratory, but if they want to pursue this idea, I can provide literature and potential contacts.  
Susan C.

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**From:** Taylor, Christopher <[Taylor.Christopher@epa.gov](mailto:Taylor.Christopher@epa.gov)>  
**Sent:** Friday, July 31, 2020 2:06 PM  
**To:** Cybulski, Walter <[Cybulski.Walter@epa.gov](mailto:Cybulski.Walter@epa.gov)>; Cormier, Susan <[Cormier.Susan@epa.gov](mailto:Cormier.Susan@epa.gov)>; Clark, Christopher <[Clark.Christopher@epa.gov](mailto:Clark.Christopher@epa.gov)>  
**Cc:** Burden, Susan <[Burden.Susan@epa.gov](mailto:Burden.Susan@epa.gov)>  
**Subject:** Question Regarding the use of Composting Materials (Wetcake) That Contain Pesticides.

Walter, Susan, and Chris –

Hi. We had a discussion last September concerning an ethanol plant in Nebraska that was having problems disposing of ethanol plant wetcake with higher than anticipated concentrations of pesticides (please see email at the very bottom). From this discussion it appears as though a couple of possible options were put forth, which I in turn passed along to Daniel LeMaistre from the Nebraska Department of Energy and Environment (NDEE). Can you tell me if he ever contacted any of you about this? I'm asking because the heads of NDEE and the Nebraska Department of Agriculture sent a joint letter to my Regional Administrator asking for help and I'm trying to figure out all that we may have already provided them.

Thank you!

Chris

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**From:** Taylor, Christopher  
**Sent:** Tuesday, September 10, 2019 11:29 AM  
**To:** Cybulski, Walter <[Cybulski.Walter@epa.gov](mailto:Cybulski.Walter@epa.gov)>  
**Cc:** Blank, Valerie <[Blank.Valerie@epa.gov](mailto:Blank.Valerie@epa.gov)>; Weber, Robert <[Weber.Robert@epa.gov](mailto:Weber.Robert@epa.gov)>; Burden, Susan <[Burden.Susan@epa.gov](mailto:Burden.Susan@epa.gov)>  
**Subject:** RE: Question regarding the use of composting materials that contain pesticides.

Walter –

Hi. Thank you very much for your help with this. I'll pass on Susan Cormier's information and contact information to the State of Nebraska to see if there's anything else they may want or need.

Have a wonderful afternoon!

Chris

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**From:** Cybulski, Walter <[Cybulski.Walter@epa.gov](mailto:Cybulski.Walter@epa.gov)>  
**Sent:** Tuesday, September 10, 2019 8:33 AM  
**To:** Taylor, Christopher <[Taylor.Christopher@epa.gov](mailto:Taylor.Christopher@epa.gov)>  
**Cc:** Blank, Valerie <[Blank.Valerie@epa.gov](mailto:Blank.Valerie@epa.gov)>; Weber, Robert <[Weber.Robert@epa.gov](mailto:Weber.Robert@epa.gov)>; Burden, Susan <[Burden.Susan@epa.gov](mailto:Burden.Susan@epa.gov)>  
**Subject:** RE: Question regarding the use of composting materials that contain pesticides.

Hello, Chris.

I am supplying what Chris Clark, who heads up the biofuels report, supplied to me in terms of anyone from ORD with knowledge on this topic. It seems Susan Cormier in NCEA may be the best ORD person to reach out to for these questions. I have included her quick remarks on this inquiry below.

I will pass along anything else I may hear. Let me know if there are any questions.

- Walter

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1200 Pennsylvania Avenue NW, Washington, DC 20460  
Telephone: (202) 564-2409 Email: [cybulski.walter@epa.gov](mailto:cybulski.walter@epa.gov)

**From:** Clark, Christopher <[Clark.Christopher@epa.gov](mailto:Clark.Christopher@epa.gov)>  
**Sent:** Monday, September 09, 2019 4:44 PM  
**To:** Cybulski, Walter <[Cybulski.Walter@epa.gov](mailto:Cybulski.Walter@epa.gov)>  
**Subject:** FW: Question regarding the use of composting materials that contain pesticides.

Hi Walter,

Below is all I got, Susan may be your best bet.

If anything else bubbles up I'll let you know.

Chris

**Christopher Clark, Ph.D.** | Research Scientist, Exposure Analysis and Risk Characterization Group |  
National Center for Environmental Assessment | U.S. EPA – ORD (MC: 8623-R) | 1200 Pennsylvania Ave., NW | Washington, D.C. 20460  
\*\*Note new phone number and physical address\*\*  
Phone: 202-564-4183 | [clark.christopher@epa.gov](mailto:clark.christopher@epa.gov)  
Physical and overnight delivery address: U.S. EPA Ronald Reagan Building 71292| 1300 Pennsylvania Ave., NW | Washington, D.C. 20004

**From:** Cormier, Susan  
**Sent:** Wednesday, September 04, 2019 1:12 PM  
**To:** Clark, Christopher <[Clark.Christopher@epa.gov](mailto:Clark.Christopher@epa.gov)>; LeDuc, Stephen <[LeDuc.Stephen@epa.gov](mailto:LeDuc.Stephen@epa.gov)>; Compton, Jana <[Compton.Jana@epa.gov](mailto:Compton.Jana@epa.gov)>; Burch, Julia <[Burch.Julia@epa.gov](mailto:Burch.Julia@epa.gov)>  
**Subject:** RE: Question regarding the use of composting materials that contain pesticides.

Pyrolysing the cakes into biochar would get rid of the pesticides and retain the carbon and nutrients.  
I'll check on the water content to see how easy it would be to dry the feedstock cakes.  
But, I would suspect that they would like to screen for contaminants and recommend levels to use as is as a soil amendment.

Be happy to help as needed, but I'm not familiar with the guidelines for application of biosolids and I was informed that the newer scientific information was removed from the OW website last week or so.

Susan Cormier

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**From:** Taylor, Christopher <[Taylor.Christopher@epa.gov](mailto:Taylor.Christopher@epa.gov)>  
**Sent:** Thursday, September 05, 2019 3:40 PM  
**To:** Burden, Susan <[Burden.Susan@epa.gov](mailto:Burden.Susan@epa.gov)>  
**Cc:** Blank, Valerie <[Blank.Valerie@epa.gov](mailto:Blank.Valerie@epa.gov)>; Cybulski, Walter <[Cybulski.Walter@epa.gov](mailto:Cybulski.Walter@epa.gov)>; Weber, Robert <[Weber.Robert@epa.gov](mailto:Weber.Robert@epa.gov)>  
**Subject:** RE: Question regarding the use of composting materials that contain pesticides.

Susan –

Hi and thank you for your response. I agree with your assessment and will get with Rob next week when he returns to the office to determine a path forward.

Have a great afternoon!

Chris

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**From:** Burden, Susan <[Burden.Susan@epa.gov](mailto:Burden.Susan@epa.gov)>  
**Sent:** Thursday, September 05, 2019 12:00 PM  
**To:** Weber, Robert <[Weber.Robert@epa.gov](mailto:Weber.Robert@epa.gov)>; Taylor, Christopher <[Taylor.Christopher@epa.gov](mailto:Taylor.Christopher@epa.gov)>  
**Cc:** Blank, Valerie <[Blank.Valerie@epa.gov](mailto:Blank.Valerie@epa.gov)>; Cybulski, Walter <[Cybulski.Walter@epa.gov](mailto:Cybulski.Walter@epa.gov)>  
**Subject:** FW: Question regarding the use of composting materials that contain pesticides.

Hi Chris and Rob,

Amy Shields reached out to Walt Cybulski yesterday with a request for an ORD contact for a biofuels/ethanol/waste management question she received from Nebraska. I'm guessing that Amy gave the Nebraska state employee (Daniel LeMaistre) Walt's contact information because he emailed Walt directly (see below).

Given the nature of Mr. LeMaistre's questions, it seems more appropriate for R7 (one of you?) to work within the Region and possibly with OLEM and/or OCSPP to address his questions. In ORD, Walt is working to identify whether we have the appropriate scientific expertise to help inform this conversation and can let you know whether the appropriate expertise is available.

Please let me know if this is something that one of you can take the lead on and work directly with Mr. LeMaistre.

Thanks,

Susan

Susan Burden, Ph.D.  
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Office of Research and Development  
US Environmental Protection Agency  
Phone: (202) 564-6308  
Email: [burden.susan@epa.gov](mailto:burden.susan@epa.gov)

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**From:** Cybulski, Walter <[Cybulski.Walter@epa.gov](mailto:Cybulski.Walter@epa.gov)>  
**Sent:** Wednesday, September 04, 2019 2:57 PM  
**To:** LeMaistre, Daniel <[daniel.lemaistre@nebraska.gov](mailto:daniel.lemaistre@nebraska.gov)>  
**Subject:** RE: Question regarding the use of composting materials that contain pesticides.

Hello, Daniel.

I am sending a quick reply to acknowledge receipt of your inquiry.

As a member of EPA's Office of Research and Development (ORD), I am looking into any thoughts ORD may be able to provide in response to your end question concerning any ideas on potential alternative uses/disposal options for the material in question. As you are likely aware, there are other offices in EPA that might also be useful to query for this particular question (e.g., EPA's Office of Land and Emergency Management (OLEM) for waste treatment/disposal issues). I am not sure if you may have reached out to anyone in the other EPA offices for some of these cross-cutting issues. I will

let you know what I am able to find out for ORD, which may or may not provide some insights for the cross-cutting issues as well. I will respond as soon as I have any information back from the people in ORD to whom I have reached out.

Regards,  
Walter

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**From:** LeMaistre, Daniel <[daniel.lemaistre@nebraska.gov](mailto:daniel.lemaistre@nebraska.gov)>  
**Sent:** Wednesday, September 04, 2019 10:56 AM  
**To:** Cybulski, Walter <[Cybulski.Walter@epa.gov](mailto:Cybulski.Walter@epa.gov)>  
**Subject:** Question regarding the use of composting materials that contain pesticides.

Good morning Mr. Cybulski,

I am with the State of Nebraska Department of Environment and Energy (NDEE) and we have some questions about one of our ethanol production facilities here in Nebraska. One of our EPA contacts suggested that you might have an answer for us or may be able to point us in the correct direction. Below is a brief description of the situation.

We have a facility taking in seed corn that has been treated with various chemicals (pesticides, herbicides, and fungicides) and using it to produce ethanol. Initially the facility claimed that the wet cake byproduct would not contain any significant levels of the treatment chemicals and would be safe to land apply as a soil amendment or fertilizer on crop land. Last year we discovered some issues with this facility because the residents of a nearby town started complaining of unusual odors coming from the facility. While we cannot act on odors directly it did lead us to identify a pile of the wet cake that was sitting onsite and rotting. Recent testing has demonstrated that the facilities assertion that their process can treat this material is incorrect; resulting in wet cake that contains high levels of the chemicals used to treat the seeds.

Since learning about the high chemical levels in the wet cake the State of Nebraska has ordered this facility to stop selling/using the wet cake as a soil amendment/fertilizer. The problem we are running into is that this material is quickly accumulating onsite and we have limited treatment or disposal options available. The following options have been suggested to resolve the situation:

- 1) Place the material in a solid waste disposal facility with a proper liner. This the option the NDEE views as the most practical at this point.
- 2) Bring in a thermal treatment device to decompose the chemicals. Due to the large volume of material it would probably require a very large unit to be effective and we run into potential issues with permitting and other media by using this option.
- 3) The facility has proposed composting the wet cake to treat the material so that it can be land applied. We have concerns about this approach because our previous experience with composting being able to effectively treat these kinds of chemicals is hit or miss. Until the facility can prove this to be effective as a treatment option the NDEE is not allowing composting for land application purposes. We have suggested using composting as a mass reducing measure to save on landfilling costs.

To make the situation a bit more complicated this facility also has difficulty complying with their water and air quality permits.

What we are looking for is any ideas you might have for potential alternative uses/disposal options for this material that we can discuss with the facility. We have an idea of how we want to proceed but are looking for any alternative

approaches that we may have overlooked. Any thoughts you might have would be greatly appreciated. If you would like to discuss this over the phone to get more details feel free to give me a call, my contact info is below.

Thanks,

Daniel LeMaistre, PE  
Waste Permits Section Supervisor, Land Division  
Nebraska Department of Environment and Energy  
PO Box 98922  
Lincoln, NE 68509-8922  
Main Office: 402-471-2186/ Direct: 402-471-4495